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JONATHAN WAYNE BOTTEN, SR.,

TANJA DUDEK-BOTTEN, ANNABELLE BOTTEN,

AND JONATHAN WAYNE BOTTEN, JR.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JONATHAN WAYNE BOTTEN, SR.;  
TANJA DUDEK-BOTTEN;  
ANNABELLE BOTTEN; and  
JONATHAN WAYNE BOTTEN, JR.,  
a minor, by and through his guardian  
JONATHAN WAYNE BOTTEN, SR.,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; ISAIAH  
KEE; MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 1-10, inclusive,

Defendants.

No. 5:23-cv-00257 JGB-SHK

**JOINT RULE 26(f) REPORT**

Date: January 8, 2024

Time: 11:00 a.m.

Judge: Hon. Jesus G. Bernal

Location: Courtroom 1  
3470 Twelfth Street  
Riverside, CA 92501

1 **I. STATEMENT OF THE CASE**

2 **A. Plaintiffs' Statement**

3 This civil rights case arises out of the detention and officer-involved shooting  
4 of Plaintiffs Jonathan Wayne Botten, Sr., Tanja Dudek-Botten, and J.B. by  
5 California Highway Patrol Officers Isaiah Kee, Michael Blackwood, and Bernardo  
6 Rubalcava ("CHP Officers" or "State Defendants") and San Bernardino County  
7 Sheriff's Department Deputies Robert Vaccari and Jake Adams ("SBSD Deputies")  
8 on February 17, 2021. At approximately 1:42 a.m. on that date, CHP Officers and  
9 SBSD Deputies attempted a traffic stop of Hector Puga's ("Mr. Puga") vehicle, a  
10 white Ford Expedition, on the I-15. Mr. Puga's vehicle exited the freeway and  
11 ultimately came to a stop in the area of Peach Avenue and Catalpa Street in  
12 Hesperia, California.

13 Mr. Puga complied with commands to exit his car and placed his hands in the  
14 air. He further complied with commands to position himself at the front of his  
15 vehicle with both hands above his head. CHP Officers and SBSD Deputies then  
16 approached Mr. Puga and shot at Mr. Puga. As a result of the shooting, Mr. Puga  
17 attempted to run away with his back towards CHP Officers and SBSD Deputies.  
18 CHP Officers and SBSD Deputies continued to shoot at Mr. Puga as he ran away  
19 with his back towards them. At some point, Mr. Puga fell onto the ground, away  
20 from the officers. CHP Officers and SBSD Deputies continued to shoot at Mr. Puga  
21 after he had fallen to the ground. Mr. Puga sustained several gunshot wounds and  
22 died as a result of those wounds.

23 Plaintiffs Jonathan Wayne Botten, Sr., Tanja Dudek-Botten, Annabelle  
24 Botten, and J.B. were inside of their then-residence, located at 17994 Catalpa Street  
25 in Hesperia, California for the duration of the incident between law enforcement and  
26 Mr. Puga. At approximately 3:00 a.m., Plaintiffs were asleep inside their residence  
27 in their respective beds when Plaintiff Tanja awoke to sirens outside of the  
28 residence. Plaintiff Tanja woke Plaintiff Botten, Sr. up and both Plaintiffs looked

1 outside their window and observed law enforcement trying to intercept a vehicle. At  
2 approximately 3:35 a.m., Plaintiff Tanja awoke again to the sound of sirens and a  
3 helicopter outside the residence. Plaintiff Tanja woke Plaintiff Botten, Sr. again and  
4 both looked outside their window and observed the incident taking place in front of  
5 their house. At around this time, Plaintiff Tanja woke her children, Plaintiffs  
6 Annabelle and J.B., and gathered them in the kitchen area. Plaintiff Botten, Sr. stood  
7 in front of the front doorway and took a video of what appeared to be a passenger of  
8 a vehicle with hands up being ordered to walk backwards. Due to the presence of  
9 law enforcement outside of their residence and law enforcement activity, Plaintiffs  
10 did not feel free to leave the premises of their home.

11 At approximately 4:20 a.m., as Plaintiffs were observing the law enforcement  
12 activity outside of their residence, Plaintiffs head shots and saw a spark hit their  
13 metal screen door as the involved officers shot at Mr. Puga and in the direction of  
14 Plaintiffs' residence. Based on the officers' shots toward Plaintiffs' residence and  
15 the officers' active efforts to apprehend Mr. Puga, Plaintiffs did not feel free to leave  
16 the premises of their home. The officer presence and shots towards Plaintiffs'  
17 residence confined Plaintiffs to their home due to the officers' show of authority and  
18 use of force.

19 Plaintiffs Botten, Sr., Tanja, and J.B. sustained gunshot wounds as a result of  
20 the incident. All Plaintiffs, including Plaintiff Annabelle, were present and observed  
21 their family members sustain serious gunshot injuries.

## 22 **B. Defendants' Statement**

23 On February 17, 2021, at approximately 1:40 a.m., California Highway Patrol  
24 (CHP) Officers Blackwood and Rubalcava began to pursue a white Ford Expedition  
25 that matched the description of a vehicle wanted in connection with a freeway  
26 shooting that occurred earlier in the Victorville Area. The driver of the Ford was  
27 later identified as decedent Hector Puga (Puga). Puga led the CHP officers,  
28 including CHP Sergeant Kee and Deputies from the San Bernardino County

1 Sheriff's Department (SBCSD) on an hour-long pursuit. Puga finally came to a stop  
2 near the intersection of Peach Avenue and Catalpa Street in Hesperia. CHP units  
3 positioned themselves behind the Ford and SBCSD units positioned behind the CHP  
4 patrol vehicles. None of the officers were aware of Plaintiffs, nor did they direct any  
5 orders towards the Plaintiffs.

6 Over the course of the next hour, officers gave Puga repeated orders to exit  
7 the vehicle and to put his hands out the window, but Puga did not comply. He rolled  
8 his window down and opened and closed the door several times, yelled inaudible  
9 comments, took off his shirt, threw items out of the vehicle, and commented that he  
10 wanted to call his mother and wife, that he was a "two-striker," and that he wanted  
11 one last cigarette. At one point, the passenger side door opened, and a female exited  
12 the passenger side and was removed from the area. Officers continued to order Puga  
13 to exit the vehicle, but he refused to comply with their commands. Sergeants Kee  
14 and Vaccari deployed several less-than-lethal munitions (bean bag rounds and  
15 pepper balls) at and into the vehicle, but Puga still refused to exit the vehicle. The  
16 seriousness of the evolving incident was obvious. Nevertheless, one or more of the  
17 Plaintiffs repeatedly and freely exited their residence to watch or record the incident.

18 At approximately 3:42 a.m., Puga finally exited the vehicle with his back  
19 towards the officers, who were giving him commands to keep his hands up because  
20 they could not see his waistband. (One or more Plaintiff was outside the residence or  
21 the open door or window watching the incident unfold.) Kee asked Puga if he had  
22 any weapons on him, and Puga stated he did not. Officers approached Puga who was  
23 standing in front of the Ford Expedition—Kee and Rubalcava approached Puga  
24 from his left side, while Vaccari and Adams approached from his right. Blackwood  
25 remained positioned behind Puga. Puga turned towards Kee and Rubalcava and  
26 reached for his waistband with this right hand. Kee saw the handle of a gun and  
27 yelled for Puga to keep his hands up, but Puga retrieved a black handgun from his  
28

1 waistband and fired one round in the direction of Kee and Rubalcava. Fearing for  
2 their lives and the lives of the other officers, Kee, Rubalcava, Blackwood, and  
3 Adams fired several rounds from their firearms at Puga. Puga ran in a northwesterly  
4 direction and continued to point his handgun back at the officers, who fired  
5 additional rounds. Puga continued to run until he collapsed on the west shoulder of  
6 Peach Avenue.

7 Paramedics and personnel from the San Bernardino County Fire Department,  
8 who were waiting in the staging area nearby, immediately arrived on scene and  
9 rendered medical aid to Puga. Paramedics pronounced Puga dead at 4:05 a.m.  
10 Paramedics also responded to Plaintiffs' residence in response to the cries for help  
11 and their call to 911, informing the dispatch operator that they had been hit by  
12 crossfire when Puga shot at the police and the police shot back.

13 Defendants deny Plaintiffs' allegations that they detained Plaintiffs, that  
14 Plaintiffs were not free to leave their residence, or that they intentionally or  
15 negligently shot Plaintiffs. Defendants further deny Plaintiffs' allegations that  
16 Defendants used unjustified or excessive force towards Puga. Defendants intend to  
17 assert various affirmative defenses, including but not limited to: they are entitled to  
18 qualified immunity and other applicable state law immunities; they had probable  
19 cause to attempt to detain or arrest Puga; their use of force was justified and  
20 reasonable; self-defense and defense of others; and contributory negligence.

## 21 **II. SUBJECT MATTER JURISDICTION**

22 This Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and  
23 1343(a)(3)-(4) because Plaintiffs assert claims arising under the laws of the United  
24 States including 42 U.S.C. § 1983 and the Fourth and Fourteenth Amendments of  
25 the United States Constitution. This Court has supplemental jurisdiction over  
26 Plaintiffs' claims arising under state law pursuant to 28 U.S.C. § 1367(a), because  
27  
28

1 those claims are so related to the federal claims that they form part of the same case  
2 or controversy under Article III of the United States Constitution.

3 **III. LEGAL ISSUES**

4 **A. Plaintiffs' Legal Issues**

- 5 1. Whether Plaintiffs Botten Sr., Tanja, and J.B.'s rights against excessive  
6 force, including excessive deadly force, under the Fourth Amendment  
7 and state laws were violated when CHP Officers and SBSD Deputies  
8 shot them;
- 9 2. Whether Plaintiffs' constitutional rights to be free from state actions  
10 that deprive them of life, liberty, or property in such a manner as to  
11 shock the conscience under the Fourteenth Amendment were violated  
12 when CHP Officers and SBSD Deputies shot them;
- 13 3. Whether CHP Officers and SBSD Deputies were negligent with respect  
14 to their handling of the situation, including using lethal force and  
15 engaging in pre-shooting negligent tactics; and
- 16 4. Whether CHP Officers and SBSD Deputies negligently inflicted  
17 emotional distress on Plaintiffs when they shot and injured Plaintiffs  
18 Botten, Sr., Tanja, and J.B. in front of Plaintiffs;
- 19 5. Whether CHP Officers and SBSD Deputies acted in reckless disregard  
20 of Plaintiffs' civil rights when they shot Plaintiffs Botten, Sr., Tanja,  
21 and J.B.
- 22 6. Damages.

23 **B. Defendants' Legal Issues**

24 1. Whether Plaintiffs can maintain a Fourth or Fourteenth Amendment  
25 claim against Defendants in the absence of any intentional or malicious conduct  
26 directed at Plaintiffs.

27 2. Whether Defendants battered Plaintiffs in the absence of any intent to  
28 touch or make physical contact with them.

1 3. Whether Defendants acted negligently in the pre-shooting or shooting  
2 tactics.

3 4. Whether Plaintiffs' Bane Act claim is time barred for failing to bring  
4 such a claim within six months of the denial of the government claim.

5 5. Whether Defendants intentionally interfered with Plaintiffs' civil rights  
6 through threats, intimidation, or coercion in violation of the Bane Act.

7 6. Whether Defendants are entitled to qualified immunity.

8 7. Whether Defendants are entitled to state law immunity for Plaintiffs'  
9 supplemental state-law claims.

10 **IV. PARTIES, EVIDENCE, ETC.**

11 **A. Plaintiffs**

12 Plaintiffs identify the following parties, witnesses and key documents on the  
13 main issues that are currently known or anticipated to be known to Plaintiffs:

14 1. Plaintiffs

15 2. State Defendants – State of California, Officers Isaiah Kee, Michael  
16 Blackwood, and Bernardo Rubalcava

17 3. County Defendants – County of San Bernardino, Robert Vaccari and Jake  
18 Adams

19 4. Police report of the incident

20 5. Video and/or audio recordings of the incident

21 6. Autopsy Report

22 7. Statements made by involved CHP Officers and SBSB Deputies (recorded  
23 or transcribed)

24 **B. Defendants**

25 **Parties & Witnesses**

26 1. Defendants CHP Sergeant Isaiah Kee and Officers Michael Blackwood and  
27 Bernardo Rubalcava, were involved in the pursuit and incident with Puga, and one  
28 or more of these Defendants responded to Plaintiffs' residence.



1           2. The following SBCSD personnel were involved in the pursuit of or the  
2 incident with Puga:

- 3           a. Sergeant Robert Vaccari (Defendant)
- 4           b. Deputy Jake Adams (Defendant)
- 5           c. Reserve Deputy III Kevin Henry, Helicopter Pilot
- 6           d. Detective Greg Hanrahan, Tactical Flight Officer

7           3. The following personnel of San Bernardino County, who responded to the  
8 incident and rendered medical aid to Plaintiffs, Puga, or the involved officers:

- 9           a. Jeremy Pedergraft, Engineer Paramedic of Medic Engine 22
- 10          b. Carlos Topete, Paramedic of Medic Engine 22
- 11          c. Jennifer Miescher, Engineer of Medic Engine 302
- 12          d. Michael Stachowicz, Paramedic of Medic Engine 302
- 13          e. Daniel Rios, Paramedic of Ambulance 302
- 14          f. Marc Chappell, Emergency Medical Technician of Ambulance 302
- 15          g. Juan Cobian, Paramedic of Medic Ambulance 302(A)
- 16          h. Noah Haney, Emergency Medical Technician of Medic Ambulance
- 17          302(A)
- 18          i. Michael Doucette, Paramedic of Fire Station #22 Ambulance
- 19          j. Andrew Walk, Emergency Medical Technician of Fire Station #22
- 20          Ambulance
- 21          k. Sheriff's Department deputies

22           6. The following witnesses, who reside in the neighborhood where the incident  
23 involving suspect Puga occurred, may have seen or heard the interaction between  
24 law enforcement officers and Puga or the medical care rendered to Plaintiffs, Puga,  
25 or the officers:

- 26          a. Christina Renee Barrett, Passenger in Ford Expedition
- 27          b. Wendy Mangerino, Neighbor witness
- 28          c. Erin Mangerino, Neighbor witness



- d. Edward Mangerino, Neighbor witness
- e. Tammy Goodson, Neighbor witness
- f. Arthur Miranda, Neighbor witness who called 911
- g. Jonathan Botten, Sr., Plaintiff hit by cross fire
- h. Tanja Dudek-Botten, Plaintiff hit by cross fire
- i. Jonathan Botten, Jr., Plaintiff hit by cross fire
- j. Annabelle Botten, Plaintiff

#### Evidence

1. Relevant Policies and Procedures of the Defendant entities.
2. Audio/video recordings, including but not limited to dashcam footage from Kee's and Blackwood's CHP patrol vehicles, dispatching recordings, and video footage taken or provided by third parties.
3. Crime and Incident reports.
4. Scene photographs.
5. Documents related to damages, including but not limited to Plaintiffs' medical records.

Defendants have already produced all non-privileged incident material to Plaintiffs' counsel.

### **V. DAMAGES**

Plaintiffs are unable to provide a realistic range of damages at this time but expect that these damages will be determined as discovery progresses. Plaintiffs also expect to pursue punitive damages against the individual Defendants and attorney fees in amounts to be later determined.

Defendants contend that they are not liable for any injury Plaintiffs suffered as a result of the incident on February 17, 2021 and dispute the amount of damages claimed.

### **VI. INSURANCE**

Defendant State of California, by and through the CHP, is self-insured.

1 Defendant County is insured pursuant to Government Code §990 et. seq.

2 **VII. MOTIONS**

3 Plaintiffs currently do not intend to file any motion to seek leave to add  
4 additional parties or claims. However, Plaintiffs reserve their right to file any such  
5 motion should the issue come up during the course of discovery. Plaintiffs propose  
6 **April 1, 2024** as the last day to file a motion or stipulation to amend the complaint.

7 At this time, Defendants do not anticipate filing any non-dispositive motions  
8 unrelated to discovery. They propose that the last day to amend the pleadings or add  
9 parties be **March 1, 2024**.

10 **VIII. COMPLEXITY**

11 The parties agree that this is not a complex case and therefore is not subject to  
12 the Manual for Complex Litigation.

13 **IX. STATUS OF DISCOVERY**

14 A related case arising out of this incident and involving the same Plaintiffs and  
15 Defendants was previously pending in state court. The parties had started  
16 conducting written discovery in that matter before the case was dismissed without  
17 prejudice. Although the parties have not started conducting discovery in this federal  
18 case, the Defendants have produced all the non-privileged incident material in *L.C.*  
19 *v. State of California (Puga)*, No. 5:22-cv-00949 KK-SHK (C.D. Cal.) that is  
20 pending in this court. In addition, the parties agreed that the depositions of the  
21 involved officers, originally set for December 2023 in *Puga*, be noticed in this case.  
22 Plaintiffs served their notice of deposing the involved officers on November 16,  
23 2023. Due to unforeseen circumstances, the depositions of the involved officers did  
24 not proceed. The parties have tentatively agreed to set the depositions of the  
25 involved-officers for the week of February 12-16, 2024, subject to the availability of  
26 the officers and counsel.

1 **X. DISCOVERY PLAN**

2 The parties will exchange initial disclosures on **January 19, 2024**. The parties  
3 do not anticipate the need to modify the discovery limits and procedures as provided  
4 in the Federal Rules of Civil Procedure.

5 Plaintiffs anticipate on taking the deposition upon oral examination of the  
6 involved officers, the additional officers who responded to the scene after the  
7 shooting, the officers' supervisors, medical personnel, and percipient witnesses.

8 Plaintiffs anticipate on serving written interrogatories, requests for admission,  
9 and requests for production of documents on the issues of liability for excessive and  
10 unreasonable force, and related state law claims.

11 Defendants anticipate propounding written discovery to include  
12 interrogatories and admission and production requests on the Plaintiffs concerning  
13 the basis for their claims and damages before taking their depositions. Defendants  
14 may also depose Plaintiffs' medical providers, the coroner/medical examiner, and  
15 San Bernardino County Fire Department staff who rendered medical aid to Plaintiffs  
16 at the scene.

17 The parties do not see any issues regarding electronically stored information  
18 pursuant to Rule 26(f)(3)(C) in this case. The parties further do not propose that the  
19 Court issue any other orders under Federal Rules of Civil Procedure 16(b), 16(c), or  
20 26(c).

21 **XI. DISCOVERY CUT-OFF**

22 Plaintiffs propose a fact discovery cut-off date of **September 9, 2024**.

23 Defendants propose a discovery cut-off date for all discovery of **October 9,**  
24 **2024**.

25 **XII. EXPERT DISCOVERY**

26 Plaintiffs propose an initial expert disclosure exchange date of **July 29, 2024**,  
27 a rebuttal expert exchange date of **August 26, 2024**, and an expert discovery cut-off  
28 date of **September 9, 2024**.

1 Plaintiffs plan on designating a police practice expert. Plaintiffs further intend  
2 on designating non-retained medical experts who treated Plaintiffs Botten, Sr.,  
3 Tanja, and J.B., for their wounds they sustained as a result of the CHP Officers and  
4 SBSB Deputies' use of deadly force. Plaintiffs reserve the right to designate  
5 additional experts should the need arise.

6 Defendants propose an initial expert disclosure exchange of **August 29, 2024**,  
7 and rebuttal expert disclosures on **September 20, 2024**. Defendants propose that  
8 expert discovery close on the cut-off date for all discovery, as stated above in  
9 section XI.

10 Defendants intend to retain and disclose expert witnesses concerning police  
11 practices and procedures and use of force. Defendants may also retain a medical or  
12 mental-health expert depending on the injuries or conditions Plaintiffs allege they  
13 suffered or developed as a result of the incident. Defendants will also disclose as  
14 non-retained experts Plaintiffs' medical and mental-health providers, the medical  
15 examiner who performed Puga's autopsy, toxicologist, and fire department  
16 personnel who rendered aid to Plaintiffs at the scene.

### 17 **XIII. DISPOSITIVE MOTIONS**

18 Plaintiffs do not currently anticipate the filing of a dispositive motion but  
19 reserves the right to do so. Defendants anticipate filing motions for summary  
20 judgment, and propose the last day to hear such motions be December 2, 2024.  
21 Defendants contend that their lack of intent as to Plaintiffs, the reasonableness of the  
22 force used, Plaintiffs' failure to timely assert a Bane Act claim in the state-court  
23 action, and their entitlement to qualified immunity are proper issues to be  
24 determined on summary judgment. At this time, Defendants do not know what  
25 issues may be determined by motion *in limine*.

### 26 **XIV. SETTLEMENT/ADR PROCEDURE SELECTION**

27 The parties elect to proceed with ADR Procedure No.#2 (Mediation Panel).  
28

1 The parties have not discussed settlement. Discovery is needed before any  
2 meaningful settlement discussions can be had.

3 Plaintiffs propose a settlement conference deadline of **October 7, 2024**.  
4 Defendants propose a November 8, 2024 deadline.

5 **XV. MAGISTRATE JUDGE**

6 The parties decline to consent to the designation of a Magistrate Judge to  
7 conduct all proceedings under 28 U.S.C. § 636.

8 **XVI. TRIAL**

9 All parties have requested or anticipate requesting a jury trial.

10 Plaintiffs propose a pretrial conference date of **December 16, 2024**, and a  
11 trial date of **January 13, 2024**. Plaintiffs estimate that the trial will take  
12 approximately 5-7 court days.

13 State Defendants propose that the final pretrial conference take place on  
14 February 24, 2025, and that trial be set for March 10, 2025. County Defendants  
15 propose that the final pretrial conference take place on April 15, 2025 and the trial  
16 be set for April 29, 2025.<sup>1</sup> Defendants estimate that trial will take 7 to 10 court days  
17 to complete.

18 **XVII. TRIAL COUNSEL**

19 Plaintiffs: Dale K. Galipo (lead), and Hang D. Le

20 State Defendants: Diana Esquivel, Office of the Attorney General for the  
21 State of California.

22 County Defendants: Shannon Gustafson (lead) and Amy Margolies, Lynberg  
23 & Watkins.

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26  
27 <sup>1</sup> County Defendants currently have two trials, each approx. seven-day trials, set  
28 in the Central District for February 25, 2025, and March 31, 2025.



1  
2 DATED: December 21, 2023

ROB BONTA  
Attorney General of California  
CHRISTINE E. GARSKE  
Supervising Deputy Attorney General

3  
4  
5 */s/ Diana Esquivel\**

6 DIANA ESQUIVEL  
Deputy Attorney General  
7 *Attorneys for Defendants Blackwood, Kee,*  
8 *and Rubalcava*

9 DATED: December 21, 2023

LYNBERG & WATKINS

10 By: */s/ Amy R. Margolies\**

11 Shannon L. Gustafson, Esq.  
12 Amy R. Margolies, Esq.  
13 *Attorneys for Defendants County of San*  
14 *Bernardino, Robert Vaccari, and Jake*  
15 *Adams*

16 \*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose  
17 behalf the filing is submitted, concur with the filing's content and have authorized  
18 the filing.  
19  
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JUDGE JESUS B. BERNAL  
EXHIBIT A: SCHEDULE OF PRETRIAL AND TRIAL DATES WORKSHEET

<b>Case No.</b>	5:23-cv-00257 JGB-SHK		
<b>Case Name</b>	<i>Jonathan W. Botten, et al. v State of California, et al.</i>		
<b>Matter</b>	<b>Plaintiff(s)' Request mo/day/year</b>	<b>Defendant(s)' Request mo/day/year</b>	<b>Court's Order</b>
<input checked="" type="checkbox"/> Jury Trial or <input type="checkbox"/> Court Trial (Tuesday at 9:00 a.m.) Length: <u>7-10 Days</u>	1/13/25	3/10/25 State 4/29/25 County	
Final Pretrial Conference [L.R. 16] and Hearing on Motions <i>In Limine</i> (Monday - <del>two (2)</del> weeks before trial date)	12/16/24	2/24/25 State 4/14/25 County	
Last Date to Conduct Settlement Conference	10/7/24	11/8/24 State 1/20/24 County	
Last Date to <b>Hear</b> Non- discovery Motions (Monday at 9:00 a.m.)		12/2/24 State 1/13/24 County	
All Discovery Cut- Off (including hearing all discovery motions)	9/9/24	10/9/24 State 12/9/24 County	
Expert Disclosure (Rebuttal)	7/29/24	8/29/24 State 10/28/24 County	
Expert Disclosure (Initial)	8/26/24	9/20/24 State 10/7/24 County	
Last Date to Amend Pleadings or Add Parties	4/1/24	3/1/24	

ADR [L.R. 16- 15] Settlement Choice:

☒ Attorney Settlement Officer Panel

☐ Private Mediation

☐ Magistrate Judge